

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ROBERT SULLIVAN,

Plaintiff,

v.

SELENE FINANCE, LP, *et al.*,

Defendants.

No. 1:16-cv-11719-MPK

**DECLARATION OF DAVID A.
CHAMI IN SUPPORT OF
PLAINTIFF'S PETITION FOR
AWARD OF ATTORNEYS'
FEES AND COSTS**

I, David A. Chami, hereby do declare as follows:

1. I am an attorney duly licensed to practice in the State of Arizona and admitted pro hac vice in the above captioned case. This declaration is based on personal knowledge of the matters set forth herein.
2. I am an attorney of record for Robert Sullivan in the instant matter.
3. I have been licensed to practice in the State of Arizona since April 2010.
4. I am the managing partner of the litigation practice for Price Law Group, APC.
5. Price Law Group is a national consumer advocacy law firm, with offices across the country.

Counsel's Experience

6. Over the past 6 years I have focused my practice primarily on Consumer Protection cases and was either the lead or supervising attorney in over 750 Consumer cases since 2015.

7. Since 2015 I have also handled high profile civil rights and insurance bad faith related matters.
8. In 2014, I obtained a jury verdict of \$952,000 in compensatory damages and \$1,904,000.00 in punitive damages for a breach of contract and bad faith case. *Woodland Springs HOA v. Mid-Century Insurance Company, et al.*, (Case No. CV-2012-090967), Superior Court of Arizona, Maricopa County.
9. On or about October 23, 2014, was awarded in excess of two hundred eighty-six thousand in attorney's fees in *Sullivan v. SRP* (Case No. 2:12-cv-01810-SRB) in the US District Court, District of Arizona.
10. In 2017, I settled a case against a large bank in an amount over two-hundred fifty thousand for harassing debt collection conduct.
11. In 2017, I settled a case against a large bank for approximately two-hundred ninety-five thousand for harassing debt collection conduct.
12. In 2018, I obtained a settlement after a preliminary award in Arbitration at nearly two million dollars in a consumer protection case against a major financial institution.
13. In 2018, I was co-counsel and helped reach a settlement in a class action lawsuit that resolved as part of a nationwide settlement. *Wendy Espinoza v. Experian Information Solutions, Inc.*, (Case No. CV-17-01977-PHX-DLR), United States District Court, District of Arizona.
14. In 2019, I was the lead attorney in a class action lawsuit that resolved as part of a nationwide settlement which resulted in a nationwide settlement. *Price v. Equifax*

Information Services, LLC, (Case No. 4:18-cv-00236-SMR-SBJ), United States District Court, Southern District of Iowa.

15. In 2019, I was the lead attorney in a class action lawsuit that was resolved as part of a nationwide settlement which resulted in a nationwide settlement. *Ledbetter v. Equifax Information Services, LLC*, (Case No. 5:18-cv-05177-PKH), United states District Court, Western District of Arkansas.
16. In 2018, I won summary judgment on claims under the Fair Credit Reporting Act (FCRA) and the Telephone Consumer Protection Act (TCPA). *Heard v. Nationstar Mortg. LLC*, (Case No. 2:16-cv-00694-MHH), US District Court, District of Arizona. Since the *ACA Int'l v. FCC*, 885 F.3d 687 (D.C. Cir. 2018) decision, the *Heard* decision has been cited by multiple courts.
17. In 2019, I won summary judgment in a Fair Credit Reporting Act case. *Henry v. Freedom Mortgage Corporation* (Case No. 2:19-cv-01121-SRB), US District Court, District of Arizona.
18. I have successfully argued in front of the 9th Circuit Court of Appeal, obtaining a reversal of the lower courts granting of summary judgment against my client. *Rodney Cable v. City of Phoenix, et. al.*, No. 14-15037.
19. I have successfully argued in front of the 6th Circuit Court of Appeal, obtaining a reversal of the lower courts granting of summary judgment against my client. *Mark Krueger v. Cenlar, et al.*, No. 20-2060.
20. I oversaw briefing in front of the 11th Circuit Court of Appeal, obtaining a reversal of the lower courts granting of summary judgment against my client. *Henry Losch v.*

Experian Information Solutions, Inc., No. 20-10695; this matter is set for trial in March 2022 where I will act as lead trial counsel.

21. In 2020, I obtained a jury verdict of \$4,500,000.00 in compensatory damages for my client in an insurance bad faith case in the District of Arizona. *Greg Jarman v. American Family Insurance*, No. CV-18-00526-PHX-SMB (dkt. 207).
22. Since 2014, I have tried to verdict more than a dozen cases in state and federal court.
23. Since 2014, I have recovered nearly forty-five million dollars on behalf of my clients.
24. I am a member of the National Association of Consumer Advocates.
25. I am the state Co-Chair for the National Association of Consumer Advocates in Arizona.
26. I have been a webinar and live instructor for NACA on the subject of the Fair Credit Reporting Act.
27. I am a past Member of the Trial Lawyers College.
28. I am a past member of American Association for Justice.
29. I am admitted in the following Districts/Courts:
 - a. 9th Circuit Court of Appeals
 - b. 6th Circuit Court of Appeals
 - c. 11th Circuit Court of Appeals
 - d. 8th Circuit Court of Appeals
 - e. Arizona Supreme Court
 - f. United States District Court of Arizona
 - g. United States District Court Eastern District of Michigan

- h. United States District Court Southern District of Texas
 - i. United States District Court Southern District of Indiana
 - j. United States District Court Northern District of Illinois
 - k. United States District Court Central District of Illinois
 - l. United States District Court Southern District of Illinois
 - m. United States District Court Western District of Arkansas
 - n. United States District Court Eastern District of Arkansas
 - o. United States District Court of Wisconsin
 - p. United States District Court District Northern District of Ohio
30. Attached hereto is a spreadsheet of the hours expended by Plaintiff's counsel on this case, as well as summary descriptions of the related tasks.

I swear under penalty of perjury that the forgoing is true and correct

Respectfully submitted this 17th day of December 2021.

PRICE LAW GROUP, APC

By: /s/ David A. Chami
David A. Chami, AZ #027585